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August 1, 2022

Via ECF and E-mail

The Honorable Katherine Polk Failla, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: In Re: GE/CBPS Data Breach Litigation, Case No. 1:20-cv-2903 (KPF)

Dear Judge Failla:

I represent Plaintiff in the above-referenced matter. I write pursuant to Rule II.B of Your Honor's Individual Rules of Practice in Civil Cases to request an additional 14-day extension of Plaintiff's deadline to file a motion for preliminary approval of the class action settlement. Plaintiff's current deadline to move for preliminary approval is August 1, 2022.

On July 15, 2022, the parties filed a Joint Letter Motion requesting an extension of time to move for preliminary approval of the class action settlement because there remained several outstanding issues to be resolved. *See* ECF No. 87. The Court granted the request and reset the deadline to August 1, 2022. *See* ECF No. 88. Over the last two weeks, the parties have continued to work on finalizing the settlement agreement and have narrowed the outstanding issues. Nevertheless, there remain several unresolved matters. Accordingly, the parties jointly request that the Court extend Plaintiff's deadline to move for preliminary approval from August 1, 2022 to August 15, 2022.

Thank you for your consideration to this matter.

Very truly yours,

A handwritten signature in blue ink that reads 'Alec'.

Alec M. Leslie

cc: All counsel of record (via ECF)

The Court is in receipt of Plaintiff's above letter, which follows on the heels of several similar requests submitted over the course of this year. On June 16, 2022, for example, the parties requested an extension of the deadline to file their motion for preliminary approval of the class action settlement and stated that they were "mindful of their previous requests and do not anticipate requesting further extensions of this deadline." (Dkt. #85). Then, on July 15, 2022, the parties requested yet another extension, stating that they had "reached an agreement in principle on the outstanding issues" and were in the process of "finalizing the settlement agreement to reflect such." (Dkt. #87). Now, in the above letter, which was filed on the date the parties' motion was due, Plaintiff represents that, contrary to the parties' previous letter, there remain issues that have been "narrowed" but not resolved.

While the Court GRANTS the parties' request for an extension of the deadline to file their motion for preliminary approval to **August 15, 2022**, it will not grant a further extension of this deadline absent a more robust explanation of the need for such an extension.

The Clerk of Court is directed to terminate the motion at docket entry 89.

Dated: August 2, 2022  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE